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11		
	Attorneys for Plaintiff and Counterclaim Defend	ant,
12	Safeclick, LLC	
13		
14	IN THE UNITED ST	ATES DISTRICT COURT
15	FOR THE NORTHERN I	DISTRICT OF CALIFORNIA
	OAKLAND DIVISION	
16	OARLAI	AD DIVISION
17	SAFECLICK, LLC, an Iowa limited liability )	Case No. C03-05865 SBA
18	company,	
10	)	JOINT MOTION AND ORDER RE
19	Plaintiff / )	SUPPLEMENTAL SUMMARY
	Counterclaim Defendant, )	
20	Countercramm Beremaunt,	JUDGMENT BRIEFING
	)	JUDGMENT BRIEFING
, l	vs.	JUDGMENT BRIEFING
21	vs. )	JUDGMENT BRIEFING
	vs. ) VISA INTERNATIONAL SERVICE )	JUDGMENT BRIEFING
21 22	vs. ) VISA INTERNATIONAL SERVICE ) ASSOCIATION, a Delaware corporation, and )	JUDGMENT BRIEFING
	vs. ) VISA INTERNATIONAL SERVICE )	JUDGMENT BRIEFING
22   23	vs. ) VISA INTERNATIONAL SERVICE ) ASSOCIATION, a Delaware corporation, and ) VISA USA, INC., a Delaware corporation, )	JUDGMENT BRIEFING
22	vs. ) VISA INTERNATIONAL SERVICE ) ASSOCIATION, a Delaware corporation, and ) VISA USA, INC., a Delaware corporation, ) Defendants / )	JUDGMENT BRIEFING
22 23 24	vs. ) VISA INTERNATIONAL SERVICE ) ASSOCIATION, a Delaware corporation, and ) VISA USA, INC., a Delaware corporation, )	JUDGMENT BRIEFING
22 23 24 25	vs. ) VISA INTERNATIONAL SERVICE ) ASSOCIATION, a Delaware corporation, and ) VISA USA, INC., a Delaware corporation, ) Defendants / )	JUDGMENT BRIEFING
22 23 24	vs. ) VISA INTERNATIONAL SERVICE ) ASSOCIATION, a Delaware corporation, and ) VISA USA, INC., a Delaware corporation, ) Defendants / )	JUDGMENT BRIEFING
22 23 24 25 26	vs. ) VISA INTERNATIONAL SERVICE ) ASSOCIATION, a Delaware corporation, and ) VISA USA, INC., a Delaware corporation, ) Defendants / )	JUDGMENT BRIEFING
22 23 24 25	vs. ) VISA INTERNATIONAL SERVICE ) ASSOCIATION, a Delaware corporation, and ) VISA USA, INC., a Delaware corporation, ) Defendants / )	JUDGMENT BRIEFING

1	Plaintiff Safeclick, LLC ("Safeclick") and Defendants Visa International Service Association		
2	and Visa USA, Inc. (collectively, "Visa") hereby file this Joint Motion Re Supplemental Summary		
3	Judgment Briefing.		
4	WHEREAS, Visa filed its motion for summary judgment of noninfringement on July 19,		
5	2005, before discovery was completed;		
6	WHEREAS, between the filing of Visa's summary judgment motion and the close of		
7	discovery, Visa produced a large number of responsive documents (see Joint Motion to Amend Case		
8	Management Order and Amended Case Management Order, dated October 13, 2005, attached as		
9	Exhibit A hereto);		
10	WHEREAS, on August 19, 2005, Safeclick deposed James Reno, who testified as the		
11	corporate representative of Arcot Systems, Inc., which Safeclick alleges was a co-developer with		
12	Visa of the 3-D Secure Protocol used in Verified by Visa;		
13	WHEREAS, on October 24, 2005, Safeclick deposed Tony Lewis, a former Visa Internationa		
14	employee who worked on the development of the 3-D Secure protocol specification;		
15	WHEREAS, Safeclick contends that Visa's reply brief raised new arguments that were not		
16	presented in Visa's opening brief; and		
17	WHEREAS, in light of the new discovery and to address these other issues, the parties wish		
18	to file short supplemental briefs on Visa's pending summary judgment motion, set for hearing on		
19	December 13, 2005;		
20	IT IS STIPULATED among the parties to this action, by and through their counsel, that:		
21	(1) Safeclick may file and serve a supplemental summary judgment opposition brief, not to		
22	exceed 10 pages, and supporting evidence, copies of which accompany this joint motion; and		
23	(2) Visa may file and serve a supplemental brief, not to exceed 10 pages, and supporting		
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1	evidence, on or before November 22, 2005.	
2	November 8, 2005	Respectfully submitted,
3		BARTLIT BECK HERMAN PALENCHAR & SCOTT LLP
5		and
6		HARVEY SISKIND JACOBS LLP
7		$_{\mathrm{By:}}$ $\mathcal{A}$ $\mathcal{A}$
8		Adam K. Mortara
9		Attorneys for Plaintiff/ Counterclaim Defendant
10		SAFECLICK, LLC
11		HELLER EHRMAN LLP
12		
13		By: /s/ Christine Saunders Haskett
14		Attorneys for Defendants Visa U.S.A. Inc. and
15		Visa International Service Association
16	IT IS SO ORDERED.	
17	Dated: 11/14/05	
18 19		Sandre B. Ormshag
20		SAUNDRA BROWN ARMSTRONG
21		UNITED STATES DISTRICT JUDGE
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